

ASHCROFT LAW FIRM™

February 23, 2018

Hon. Valerie E. Caproni
United States Courthouse
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Kolodiy v. Afineevsky, No. 1:17-cv-00830-VEC*

Dear Judge Caproni:

We write to jointly request a stay of all activity in this matter, including discovery and the production of documents, until March 15, 2018. As the Court is aware from prior correspondence, we have been working towards a consensual resolution of the case which process, we believe, is nearly complete. An agreement has been largely negotiated and drafted, but still needs to be finalized, signed, and executed upon in accordance with its terms. We expect this to happen during this period and, for that reason, are not proposing a revised schedule. This is the fourth request for an extension of the deadlines. See D.I. 61.

Respectfully submitted on this 23rd day of February, 2018:

/s/ Matthew G. Berkowitz

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